



Abt Associates Inc.

memorandum

Housing and Community Revitalization

Date March 14, 2003

To Honorable Dickinson Debevoise
Gustav Heringburg, Special Master
Zinnerford Smith, Chairman, Board of Commissioners
Harold Lucas, Executive Director

From MaryAnn Russ, Principal Associate
Victoria Main, Senior Associate

Subject Report to the Court

This report covers the months of January 2002 through December 2002, and updates the progress of the Newark Housing Authority since the written report of October 9, 2002 and the most recent verbal Status Report delivered at the Court Hearing on October 30, 2002.

1. Vacant Unit Turnaround

The period covered by this vacancy report is January 2002 through December 2002. As in former reports, the data used for this report was obtained from the Managers' monthly vacancy logs, which are summarized in the Monthly Vacancy Reports attached to this report.

Over the past twelve months, the adjusted vacancy rate averaged 2.51 percent, and the number of units vacant more than one year averaged 10. 69 new townhouse units at Wynona Lipman Gardens were completed construction and all were rented by the end of June. This rate of vacancy is as good as that of any large housing authority of which we are aware. It represents praiseworthy performance.

During the twelve months covered by this report, there were 906 move-outs from existing units, compared to 781 last year. The move-outs were spread throughout all types of housing. At the end of December 2002 there were 267 vacant units of which 24 were units being rehabilitated under NHA's modernization program.

NHA's Average Total Turnaround Days were 64.62 compared with 78.68 for the prior year. This reduction is due to several factors. First, property managers are being held

accountable for the turnaround time of each unit on their properties. NHA's performance evaluation system grades managers and site staff on meeting turnaround standards and this has resulted in a more focused approach to repairing units. Second, NHA is being more aggressive in using its modernization program to address units that require repairs above and beyond those normally associated with making a unit ready for occupancy. The days a unit is in on-schedule modernization do not count towards Total Turnaround Days. Third, NHA has revised its methodology for calculating the move out date, to ensure that the move out date is the date NHA is able to take possession of the unit. This became an issue in those cases where NHA was unable to gain possession for 30 days because of abandoned property in units, which is typical following an eviction and also occurs in certain transfers. Developments with high turnover rates include both family developments and mixed population. NHA continues to work toward a goal of 30 days.

During the year NHA raised the issue of how turnaround time should be computed. At the beginning of the year NHA was including the 30 days lost when property is abandoned in a unit in its turnaround time calculation. The rates shown in the paragraph above have been corrected by deducting the required 30 days for abandoned property. Abt Associates has a concern that 30 days is being deducted in every unit turnover at some sites, not just those that involve abandoned property. The system must be fine-tuned to distinguish these two situations.

In 2002 NHA achieved an average adjusted vacancy rate of 2.51 percent, a decrease from the 2001 average of 2.75 percent. During the year, NHA exceeded 3.00 percent only twice (not consecutively) and quickly reduced the rate below 3.00 percent the following month. The last eight months were all below 3.00 percent. Attached to this report is a summary of vacancy and turnaround data.

2. Permanent Skilled Maintenance Staff

On site, NHA has 96 Repairers and 131 BMWs. These staff members were responsible for 44,866 work orders, requiring 232,691 staff hours. This is an average of 1002 hours per staff member, far below fully productive levels. In addition, NHA has 69 skilled tradespersons, an increase from the least year's staffing of 42 skilled tradespersons, and far more than the 11 recommended initially. NHA also has 21 member grounds crew, 7 building services cleaning personnel and 31 boiler operation skilled trades persons, for a total maintenance department of 355 personnel.

It should be noted that HUD has issued a proposed rule in which it revises satisfactory levels of performance for completion of work orders under its Public Housing Assessment System (PHAS). According to the proposed rule, emergency work orders will still have to be completed within 24 hours; to receive a Grade A, non-emergency work orders will have to be completed in an average of 7 days or less, Grade C will require completion in an average of 15-22 days and a Grade F will reflect an average completion rate of 30 days or more. At this time, the impact of this proposed rule on NHA's staffing is unknown.

3. Monthly Occupancy Reports

In 2002, an average of 128 offers were made each month, with 84 leases being executed and 47 offers being refused.

Of the average 128 offers per month, 19 were made to Whites, 106 to African Americans, 3 Asians, 25 Hispanics and 0 Native American (although 5 offers to Native Americans were made during the year). Of these offers, 31 were to Mixed population buildings, where the breakdown was an average of 34 offers to younger persons with disabilities and 10 offers to elderly applicants. Of the average of 47 families and individuals refusing offers, 7 were White, 38 were African American, and 1 was Asian. 5 were elderly families and 13 were disabled families.

Most of the families and individuals who refused did not show for or did not respond to NHA's offer or did not like the location of the unit being offered. It is interesting to note that with site based waiting lists for the mixed population buildings, there were no refusals for location from elderly families during the year.

4. Waiting List Issues

To ensure that the public housing waiting list is being administered properly Abt requested a copy of the automated report on calendar 2002 waiting list admissions (as opposed to transfers). NHA was immediately cooperative in furnishing this information.

Of the 773 waiting list admissions in the year 2002, 262 were persons selected from the disabled waiting list, 49 were selected from the elderly waiting list, 4 were from the near elderly list, and 458 were from the non-elderly, non-disabled families waiting list.

During all of 2002 waiting lists for the mixed population and elderly designated buildings were open. The waiting list for family housing was open only on May 29th, 30th, and 31st.

What is disquieting about the automated report is that it shows that 66 applications were accepted and families admitted when the waiting list was closed. 36 applications were accepted in 2002 before the waiting list opened and 30 were accepted after it was closed.

Another aspect of the automated waiting list report that must be checked is that among the 66 applications accepted while the waiting list was closed were 22 that were processed from receipt of application to admission date in less than 10 days. 4 applicants were admitted in two days or less. To comply with the HUD regulations and the Admissions and Continued Occupancy Policy, NHA must obtain written third party verification of income, deductions from income, preferences, criminal history, utility history and tenant history before an applicant can be admitted. It is impossible to complete all the required verifications in a day or two. The standard for application processing is sixty to ninety days.

Neither Abt Associates nor NHA has yet performed the detailed file reviews necessary to determine whether the problem described above is simply the result of data entry errors,

programming problems or whether there is a real issue with waiting list administration. We wish to make clear that we are simply flagging the matter at this time rather than imputing any motives or implying that anything improper has occurred.

5. Availability of bi-lingual staff to assist Spanish speaking applicants and residents:

In the Occupancy office there are four bi-lingual staff available to assist Spanish speaking applicants in any aspect of the application process. There are not enough bi-lingual staff to ensure that the individual staffing the window is a Spanish speaker. We suggest that a full-time bi-lingual receptionist be added to the Occupancy staff. This individual should be trained as an occupancy technician, but most of his/her time will be taken up just staffing the window. This is a more efficient and more polite approach than interrupting the Spanish speaking staff while they are conducting interviews or making Spanish speaking applicants wait for someone who can help them.

At the properties, NHA's procedure to provide bi-lingual staff when needed for meetings and interviews with Spanish speaking residents is neither well understood nor well observed. When managers meet with their residents who need information presented in Spanish, they do not know how they are supposed to get someone to meet the need. It is impossible to tell from conversations with the managers whether there is actually a shortage of bi-lingual management staff or whether it is simply a matter that the staff is not following the existing procedure.

6. Current Status of Stella Wright Homes Relocates

According to a report submitted to Abt Associates as of January 23, 2003, of the 797 families and individuals (including family splits) who left Stella Wright Homes, 191 are living in townhouses, 228 have Section 8 housing choice vouchers, 192 are living in public housing family developments, 41 are living in elderly or mixed population developments and 143 are no longer eligible for services. Of those ineligible, 29 were skip-outs, 4 were lock-outs, 62 were evicted, 33 had moved out, and 15 had died.

Of the 228 families living in private rental housing with Section 8 vouchers, 13 remained in a census tract with 40 percent families in poverty, 36 moved to a census tract with 30 percent families in poverty, 44 moved to a census tract with 20 percent families in poverty, and 123 families moved to a census tract with less than 20 percent families in poverty. The 12 families who ported out of Essex County are not tracked as to the poverty percentage of their census tract.

As of December 31, 2002, 437 families (67 percent) had received mobility counseling. Despite significant efforts by the mobility counseling and HOPE VI staff, the remaining relocated families appear to be uninterested in mobility counseling. This could mean any number of things – families might be satisfied with their current housing situation, they might believe that mobility counseling will not be useful, or they might be apathetic. It

must be noted however, that NHA's efforts to reach these families have been extensive, including visiting them in their current housing.

7. Designated Housing for the Elderly

During the past year NHA submitted a successful application to HUD to designate 840 units for elderly and near elderly families. The buildings where designation occurred were located in Steven Crane (NJ-16, 22C and 22D), Kretchmer (NJ-17 and 21A), Foushee Towers (NJ-19), Seth Boyden (NJ-21E and 21F), and James C. White (NJ-25). The units retained as mixed population numbered 1,919 and were located in all the buildings except Foushee and James C. White, which are individual buildings rather than building clusters.

Now that HUD has approved NHA's Plan for Designation of Elderly Housing, NHA is obliged to offer voluntary transfers, at its expense, to both young disabled residents from buildings now designated as elderly to the remaining mixed population buildings and to elderly residents from the remaining mixed population buildings to the elderly buildings. There is a great deal of confusion about this topic. Some managers of the newly designated elderly buildings believe that all their younger disabled residents are required to transfer out.

A procedure is needed that will address exactly how these transfers will take place and who will have responsibility for all the steps in the process. As soon as the procedure has been agreed upon and affected staff members have been trained, offers to people on the waiting list should stop. Logically, offers to young disabled residents at the senior buildings should take place first in order to create vacancies into which seniors can move. Questions exist about the order of such offers. The mechanics of such moves may be formidable, so the moving company must be lined up well in advance and such details as the disconnection and reconnection of telephone and cable service worked out. If all these matters are not absolutely clear to the responsible staff, bedlam and bad publicity will ensue.

8. Section 8 Program

The months of January through August have been covered in earlier reports to the Court. Timely reports were received from NHA for the months of September, October, November and December. The Section 8 waiting list was closed for this entire period.

In the month of September 33 vouchers were issued, 6 to Hispanic families and 27 to African American families. 41 Housing Assistance Payments contracts were executed, 6 on behalf of Hispanic families and 35 on behalf of African American families. None of the vouchers issued or HAP contracts executed involved families who were relocating from Stella Wright Homes. No families were denied participation during the month of September.

In October, 30 regular vouchers were issued and 3 relocation vouchers were issued. 4 of the families receiving vouchers were Hispanic and 29 were African American. 33 HAPS were signed on behalf of waiting list families in October and 3 on behalf of relocating families. The racial breakdown of the families on whose behalf HAPS were signed was 7 Hispanic and 29 African American. Again in October no applicants were denied participation.

In November, 8 regular vouchers were issued, all to African Americans. 5 relocation vouchers were issued, again, all to African Americans. 63 regular vouchers expired in November. 4 HAPS were executed on behalf of regular voucher holders and 4 were executed for relocating families.

14 vouchers were issued to regular waiting list families in December, 2 Hispanic and 12 African American. 18 were issued to African American relocatee families. HAPS were executed on behalf of 11 African American families with regular vouchers.

Maryann-Isn't this a pretty low level of activity for a \$8 program of NHA's size?

9. Corrected Flat Rent Schedule Needed: NHA's current Flat Rent Schedule, in effect, averages the results of a market study across NHA's properties to produce a simple flat rent schedule, resembling, in many ways, a ceiling rent schedule. This approach is at odds with the regulatory guidance on flat rents and, indeed, the statute, which require the PHA to consider "the location, quality, size, unit type and age of the unit as well as any amenities, housing services, maintenance and utilities provided by the PHA". It is plainly not possible for flat rents developed in compliance with that requirement to be the same, for example, for Wynona Lipman Gardens and Felix Fuld or Hyatt Courts. They do not have equivalent locations, quality, sizes, unit types, ages, or amenities. The underlying analysis performed for the flat rents confirms the distinction within NHA's stock.

Several months ago, NHA has agreed to correct the flat rent schedule to conform to the variations in NHA's units as confirmed by the market study, but this has not yet happened. The result of the failure to implement more accurate flat rents has been to offer rents that are too high to residents of NHA's older, smaller and more poorly located communities while offering rents that are too low to those residents who are already fortunate enough to reside in the best and newest developments.

10. Reasonable Accommodations to Persons needing assistance with paperwork

A question has arisen about whether or when NHA staff should assist residents in completing their paperwork. Some staff believed that in no cases were they to fill out the forms for residents. Other staff had a different understanding and thought that the ban on assisting with paperwork was limited to helping residents complete money orders or checks. In either case, there are important issues here - the HUD requirement that PHA staff provide reasonable accommodations in their procedures and practices for residents with disabilities, and the practical fact that this approach does not work.

Many residents of the designated senior and mixed population buildings cannot read or cannot write well enough to be understood. The obligation to assist residents who cannot read and/or write with their reexamination paperwork is quite clear in the 504 regulations. A PHA cannot refuse to do this since it cannot be considered an undue financial and administrative burden or a fundamental alteration in the nature of the PHA's service.

In fact, the staff of these buildings suggested that fewer than ten percent of all residents bring or submit correctly completed reexamination forms that the staff can read and use. It seems likely that the entire process at these buildings could be streamlined by sending the residents a simple one-page letter in large print that notified them of their upcoming reexamination interview with the date, time and location in bold face type.

The questions about staff assisting with filling out money orders or checks relate to a different issue. NHA's policy is, no doubt, designed to reduce the possibility or appearance of employee theft. The issue could be dealt with by permitting an employee to assist residents in this manner only when there is another employee available to review and certify that the payee and amounts are entered correctly.

12. Additions to resident households: In spite of the fact that both NHA's Admissions and Continued Occupancy Policy and Lease address the questions of when NHA **must** add family members (children added because of birth, adoption, or court awarded custody) and when the process is discretionary, nothing about this is well understood. Some management staff believe that they are **never** permitted to add adult family members. Others understand that they may do this, but do not understand the steps they are supposed to follow. Without a doubt this policy is being implemented in a manner that is not uniform. One approach to resolving this matter would be to develop a procedure about adding family members.

13. Children in designated elderly and mixed population buildings: There has always been a consensus that children should not occupy units in NHA's designated elderly and mixed population buildings. This consensus has never been made an explicit policy in the ACOP, however, except for the fact that many overcrowded families (who would fall under Category 1 Administrative transfers) in the elderly and mixed population buildings are overcrowded because they have added children.

The concept has fairly universal acceptance for several reasons: first, the units are quite small and were never designed to house children; second, the buildings themselves were not designed for and are not suitable for children; third, the presence of children disturbs other residents; and finally, there are plenty of units of the right size and type for such families, particularly given that transferring families have a higher priority for available units than do new admissions (except in the case of townhouses, where one in four available townhouses must be filled by applicants until the Court-established target of 478 applicant families is reached). The issue that must be addressed with respect to preserving the designated elderly and mixed population buildings for adults is ensuring full compliance with the familial status nondiscrimination requirements. In short, since

the 1987 Fair Housing Act Amendments, landlords may not discriminate against families with children¹.

For NHA to enforce an adults only policy at its designated elderly and mixed population buildings, it must have and enforce two policies: first that any applicant for an elderly designated or mixed population building whose family grows (through birth, adoption, marriage, or court awarded custody of children) after the application was filed and before they receive a housing offer must be moved to the appropriate bedroom size family unit waiting list; and second, a that a resident family of an elderly or mixed population building that adds children under 18 through birth, adoption or court awarded custody gets a speedy transfers to appropriately sized family housing². The ACOP should be amended to accomplish this.

The Occupancy Department should distinguish, in the case of applicants, between individuals who had or would regain custody of existing children once they obtained housing and those whose additional children were added after their applications. The former case is one of fraud, but the latter is not.

14. Transfers

The transfer policy as laid out in the ACOP is not working. Several problems have been observed:

- residents are not always informed by their managers when NHA learns that a transfer is mandatory and only one offer will be made (and that failing to accept a transfer will result in lease termination;
- the transfer request packages sent to Occupancy through the District Managers are not always complete or correct;
- when the packages are not complete, they are not always returned for correction to the housing manager;
- the transfer waiting list does not appear to be updated as required;
- the categorization of families on the transfer waiting list may not be correct;
- managers may never know that transfer offers have been made and rejected by the family, meaning no lease enforcement action will be taken;
- even though most of the transfers on the list have a higher priority than new admissions, people are being admitted to housing from the waiting list.

¹ The Act itself permits certain elderly housing, to wit, properties where at least 80 percent of occupied units are occupied by at least one person 55 years of age or older, not counting units occupied by younger persons as a reasonable accommodation to their disabilities.

² Note that since the passage of the 1998 CHWRA, PHAs have been required to add such children to the lease.

In summary, before the transfer process was moved to the Occupancy Department, it was administered in a blatantly discriminatory way, with transfers being granted mainly on the basis of whom a resident knew and whether the resident had a good relationship with his/her manager. Today the transfer system is just about perfectly non-discriminatory - hardly anyone gets a transfer, except, possibly to a townhouse. This was not the intention of the Board or the ACOP. Fixing this situation will require some more detailed procedures and much better communication between the Occupancy Department and housing management.

15. Re-examinations and new leases for residents with rent arrearages

As reported, NHA legal department believes that signing a new lease with a resident who owes delinquent balances to NHA at the time of lease execution extinguishes the balance. This argument has apparently been successfully mounted by Essex Newark Legal Services. The way to overcome the problem is to make sure that the rider executing the new lease states not only the amount of new monthly rent but the total amount owed. If a repayment agreement has been executed, the rider can state the amount of rent that represents both the income-based new rent plus the monthly amount to be applied to the delinquent balance. This approach will mean that if the resident honors the new terms, including repayment of the balance, NHA cannot proceed with a lease termination action for non-payment. So, the question must be decided in each individual case - is NHA hoping to regain possession of the unit (in which case a new lease should not be executed) or is NHA hoping to have the arrearages cleared?



HAROLD LUCAS, ESQ.
Executive Director

*Fax Received this Morning
(3/17/03)*

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March 14, 2003

Ms. Mary Ann Russ, Principal Associate
Ms. Victoria Main, Senior Associate
Abt Associates
3860 Kingston Blvd.
Sarasota, FL 34238

Re: Current Issues / Memorandum of February 7, 2003

Dear Ms. Russ:

Last month in an "internal memo" you advised Jimmy Miller, the former Deputy Executive Director of certain concerns that you have with respect to Occupancy and Housing Management activities at the Housing Authority for the City of Newark (Authority). The following is our response.

Nice words - Isn't Working

1. **Availability of bi-lingual staff.** Currently, the Authority's Occupancy office has four bi-lingual staff members who are available to assist individuals who do not speak or understand English. With respect to the Authority's management offices, our employee profile reflects that there are bi-lingual personnel in management, maintenance, and clerical positions throughout the Authority. As the Authority continues to serve its diverse community, we are utilizing all existing resources to insure that our Spanish-speaking populations concerns are understood and addressed. In concert with this process of aligning existing resources, the Authority is also working to provide bi-lingual personnel in all departments during normal business hours.

Relative to your general comment on staff's awareness of NHA's procedure to provide bi-lingual staff when needed said procedures will be revisited to insure that our employees understand and adhere to the procedures in place.

*Not Attached
Maybe OK*

2. **Flat rent schedule.** The Authority's flat rate rent schedule is based upon the information derived from the market study of each area where the Authority has public housing. In reviewing this data, the Authority considered the unit size and age, the location, utilities, available services, and maintenance to determine the respective flat rents. The attached schedule reflects the proposed revised flat rent structure for each development.

3. **Reasonable accommodations with paperwork.** In accordance with the Authority's policy staff is to provide all residents and applicants with assistance in preparing the necessary forms and other paperwork when needed. If a resident or applicant has problems with reading or comprehending the documents required by the Authority and HUD, the Authority staff has been directed to provide all reasonable assistance to those individuals. Additional training will be provided to staff to in our efforts to better serve interested applicants as well as residents in completing all required documents.

Does not apply to this Plan
4. **Site-based rent collections.** Since December 2002, we have begun to collect rent at the various sites for the convenience of our residents. The managers report that the process has been working well and that it has the overwhelmingly approval of the tenants. With the implementation of a site-based rent collection system, we no longer experience significant delays in the collection of funds and the issuance of receipts.

Actually approved in August
5. **Resident Transfers due to designation plan.** The process to implement the designated housing plan approved by HUD in December 2002 is underway. We are providing training and written procedures for managers and occupancy specialists as to how to implement the plan. We do not believe that the designated housing plan will have a negative effect on either vacancy or turnaround time.

Impossible. Some delay would be OK though
6a. **Applicant Housing Choice.** We have reviewed the recommendation regarding whether applicants may choose the "next available unit" and agree that it should be added to the application. We will implement a procedure that will provide information on location of the sites and average "waiting days" by site and bedroom size to anyone who is making a choice. Currently, we allow modifications of choices of site only during the annual waiting list update period. We believe that allowing applicants to modify their choice at other times during the year would lead to disruption of the occupancy process. Section 3 A 2 of the ACOP provides that an applicant is given the opportunity to make changes when the waiting list is updated. We will continue to follow the ACOP as adopted by the Board of Commissioners.

First Avail Unit is in current ACOP
6b. **Additions to resident households.** The policy as to the addition of members is clearly stated in the ACOP, Chapter 4, Paragraph C, on page 24. We have conducted training of our staff to advise them of the procedure. To further reinforce this procedure, we will develop a "step-by-step" checklist to inform staff of their obligations under the ACOP. The final arbiter of whether a person is added to the lease is the Director of Property Management.

7. **Move-out dates in the automated system.** The Authority has five types of move-outs. They include evictions, skip-outs, transfers, pre-planned move-outs and death. In the case of evictions and skip-outs, New Jersey statutes gives the tenant up to 30 days to remove their belongings from the date the Authority obtains possession of the unit or regains the unit through legal procedures. In the case of transfers, many times the resident is unable to move his or her property in a timely fashion. This renders the unit not available for re-rental. In the case of death there is need to determine whether there is a remaining family member or next of kin that is entitled to the unit, or who is entitled to remove the personal property.

They are giving themselves 30 days extra on every move-out.

Only in rare cases, does a tenant voluntarily move-out giving proper notice. We will investigate the practicality of developing separate move-out codes to cover the various situations that we face routinely. In the meantime we will follow the law and HUD guidelines in determining the date that a unit is available for rental for purposes of determining turn around time.

Too
specific

8. **Changing Anniversary Dates.** The administrative process associated with the reexamination cycle is being modified. The factors that are attributable to the delay of reexamination vary. The Authority's goal is to achieve 100% recertification within the designated timeframe.

9. **Delay in criminal record.** Tracking systems are being developed to expedite the requests for criminal record checks.

Doesn't address
larger issue of
kids in bedrooms

10. **Children in designated elderly and mixed population sites.** Our policy is to enforce HUD regulations regarding right sizing of units to correct under-housing of a family. Where a resident legally obtains custody of a child(ren) that requires a unit with additional bedrooms, that resident will be transferred when an appropriate size unit is available.

With respect to applicants requiring a larger unit than was initially applied for, the Occupancy staff will review the current listing of available units and advise the applicant of the unit in accordance with the applicable procedures.

Not
True

11. **Transfers.** It is the opinion of Authority staff that the problems, to the extent that they existed, have been resolved in accordance with the ACOP. We continue to enforce the terms of the ACOP and train the staff in its proper application. Our records reflect that not only is our transfer process non-discriminatory, but that residents are routinely being transferred for various reasons provided for in the ACOP other than to occupy the townhouses.

Problem
still exists

12. **Interim increase in rent.** Managers and staff have recently received training on income disallowance, including how such is applied in situations where the resident receives additional earned income. This includes information regarding the implementation of Section 508 of the QHWR. You bring to our attention that the ACOP that was adopted in March 2000 does not reflect the subsequent regulations promulgated by HUD implementing this aspect of the QHWR. While we are complying with QHWR in this regard, we will undertake to amend the income determination provisions of the ACOP to properly reflect HUD regulations.

Good News

13. **Re-examination and new basis for residents with rent arrearages.** Counsel has informed me that the Authority successfully appealed the decision of the Court to the effect that the issuance of a new lease or a rider thereto adjusting rent constitutes a waiver of any existing rent balances. The Appellate Division of the Superior Court held that when the Authority adjusts rent in accordance with the terms of the lease and HUD regulations, such action does not constitute a waiver of outstanding rent. So as to avoid any question of waiver we included a provision in the revised lease clearly stating that the execution of the lease or any rider thereto shall not constitute a waiver of any rent balance. If a tenant is transferred with a balance to deal with emergent situations, the outstanding balance is carried to the new unit.

The above responses address the issues in your February 7, 2003 letter. While your comments in the referenced letter were general in nature, it did encourage critical thinking and review. However, I am in a better position to effect positive change when given specifics regarding our programmatic operations.

As I mentioned during our meeting in December 2002 and in subsequent correspondence, I would appreciate it if you would communicate with me directly on all issues and inquiries, so I may insure that they are responded to promptly. I can be reached at 973-430-2200. My fax number is 973-642-1242.

Sincerely,



Harold Lucas

CC: Shaye Aracomi, Assistant Executive Director
Frank Armour, General Counsel
Dwight Browe, Director
Walford Evans, Administrator
Oliver Lofton, Litigation Administrator
Veretta Sims-Hill, Assistant Executive Director